

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR No. F-04-010

FONTAINE TRAILER COMPANY

PRINCETON KY.

JULY 23, 2004

MARK LABHART, REVIEWER

PLANT I.D. # 021-033-00035

APPLICATION LOG # 56033

SOURCE DESCRIPTION:

The source manufactures heavy truck trailers using unfinished steel and prefabricated parts. The primary sources of emissions from this facility are the painting operations. Currently there are two spray booths for painting the completed trailer frames (Line 5 and Line 6), and a small paint booth for coating pre-manufactured parts. The painting process for a completed trailer frame currently can exceed 4 hours. This is because prep work, priming, top coating and drying are all performed in each of the single booths, Line 5 and Line 6. The source plans on adding a designated priming booth in Line 5. This will enable the production of 3 trailers per 8-hour shift.

Two abrasive shot blast booths are currently in use, and the source is planning to add a third. There are many welders and several natural gas space heaters. The abrasive blasting operations, welding, and heaters are insignificant activities.

COMMENTS:

Fontaine Trailer Company has requested a Conditional Major permit since the anticipated actual emissions, based on their capacity to manufacture trailers, will not exceed major source thresholds. Plant wide potential to emit included emission calculations from the welding equipment, abrasive blasting operations and the heating equipment.

- Regulation 401 KAR 59:010, New process operations is applicable.
- Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances is applicable.
- Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations is not applicable, since emissions with the Conditional Major limitations will be below major source thresholds.

Emissions for the paint booths were determined by material balance. Dry filters are used for PM control. Assumed efficiency for the filters was 90%.

Emissions for the abrasive blasting operation are based on AP-42 factors.

Emissions for the welders are based on AP-42 factors.

Emissions for the natural gas heaters are based on AP-42 factors.

EMISSION AND OPERATING CAPS DESCRIPTION:

Operating limitations shall be, VOC emissions no more than 90 TPY, single HAP emissions no more than 8.5 TPY and total HAP emissions no more than 11 TPY. Additionally, Fontaine Trailer shall limit emissions of Hexamethylene Diisocyanate (CAS 822-06-0), to less than 134 lbs/year for compliance with State Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances.

OPERATIONAL FLEXIBILITY:

Fontaine Trailer Company is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.